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Attorneys for Plaintiffs  
 DENIZ BOLBOL, JOSEPH CUVIELLO  
 and ALFREDO KUBA

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

DENIZ BOLBOL, an individual; JOSEPH  
 CUVIELLO, an individual; and ALFREDO  
 KUBA, an individual,

Plaintiffs,

v.

THE CITY OF SAN JOSE, AND HP  
 PAVILION MANAGEMENT,

Defendants.

Case No. C 04-0082 JW

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING TIME FOR  
 FILING OF MOTION FOR  
 ATTORNEY'S FEES**

Hearing Date: TBD  
 Time: 9:00 a.m.  
 Courtroom: 8, 4<sup>th</sup> Floor  
 The Hon. James Ware

WHEREAS, on August 30, 2006, the Court issued an Order Regarding Pretrial Motions  
 and also issued a Judgment and Permanent Injunction (collectively, "Orders and Judgment");

WHEREAS, the Orders and Judgment provide that Plaintiffs may recover reasonable  
 attorneys fees incurred in this matter;

WHEREAS, Civil Local Rule 54-6 requires that the parties meet and confer for the  
 purpose of resolving all disputed issues relating to attorney's fees before making a motion for  
 attorneys fees;

1 WHEREAS, additional time is necessary to enable the parties to meet and confer  
2 regarding any disputed issues relating to plaintiffs' attorneys fees before making a motion for an  
3 award of attorney's fees, as required by Civil Local Rule 54-6;

4 WHEREAS, additional time may allow the parties to resolve any disputed issues relating  
5 to attorney's fees, thus obviating the need and expense of a motion for an award of attorney's  
6 fees;

7 WHEREAS the court's rulings on post-trial motions is pending;

8 The parties, pursuant to a stipulation, hereby respectfully request that the deadline for a  
9 motion by plaintiffs for attorney's fees be extended by ninety days, to and including March 12,  
10 2007.

11 Dated: November \_\_, 2006

GONZALEZ & LEIGH, LLP

12  
13 By: /s/

G. Whitney Leigh

14  
15 Attorneys for Plaintiff

DENIZ BOLBOL, JOSEPH CUVIELLO and  
16 ALFREDO KUBA

17 Dated: November 21, 2006

BERLINER & COHEN

18  
19  
20 By: [Signature]

Frank R. Ubhaus

21 Attorneys for Defendant

22 SAN JOSE ARENA MANAGEMENT  
23 COMPANY, LLC

24 **ORDER**

25 **IT IS SO ORDERED.**

26 Dated: November 28, 2006

27  
28 [Signature]  
The Honorable James Ware

Stipulation and [Proposed] Order Extending  
Time for Filing of Motion for Attorney's Fees

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*Bolbol, et al. v. The Ringling Bros., et al.*  
Case No. C-04-00082 JW